

STATE OF ILLINOIS  
ILLINOIS COMMERCE COMMISSION

JO-CARROLL ENERGY, INC.,	)	
	)	
Complainant,	)	
	)	
vs.	)	No. 02-0593
	)	
ALLIANT d/b/a INTERSTATE POWER	)	
AND LIGHT CO.,	)	
	)	
Respondent.	)	

**AFFIDAVIT OF RICK M. KNIPFER ON BEHALF OF JO-CARROLL ENERGY, INC.**  
**IN SUPPORT OF THE MOTION FOR SUMMARY JUDGMENT**  
**FILED BY JO-CARROLL ENERGY, INC.**

RICK M. KNIPFER, on oath, first duly sworn, states as follows:

1. Affiant is the same person who executed an Affidavit Marked Exhibit A and attached to the Motion for Summary Judgment filed in this cause by Jo-Carroll Energy, Inc.
2. If sworn as a witness in the above cause he could competently testify to the following matters.
3. Affiant is a member of the staff of Jo-Carroll Energy, Inc. (Jo-Carroll) and serves Jo-Carroll in the position of Engineering & Operations Manager.
4. Affiant was employed by Jo-Carroll Energy, Inc. in August 2000 and has worked for Jo-Carroll as the Engineering & Operations Manager since employment. The duties of Affiant as Engineering & Operations Manager include supervision and coordination of the engineering and operation needs of Jo-Carroll which include determination of electrical needs of member consumers; assisting in locating service connections for new members; designing electrical services and the routes for such electrical service to new members and changes in existing service for existing members; acting as liaison for Jo-Carroll with outside suppliers of

engineering services and materials; and supervision of other Jo-Carroll personnel who perform duties related to the foregoing described activities.

5. Affiant became acquainted with the proposed service to Jamie Rowe which is at issue in the above cause when the customer requested service from Jo-Carroll. At that time, James Rowe advised Jo-Carroll he contemplated a subdivision would be constructed on his premises. Affiant is also familiar with Jo-Carroll's initial estimate to construct facilities to the customer, Rowe. That initial estimate of \$10,500.00 was made when the customer's residence location was tentative and other homes were being considered. Since then, the customer's residence and meter location is known and the customer states no other homes are planned. Accordingly, Jo-Carroll has determined the appropriate route, based upon accepted engineering practices, to be used to serve the Jamie Rowe residence and to meet the system needs of Jo-Carroll, is a route from Jo-Carroll's line located along Indian Ridge Road to the west and south of the customer's residence. Such route is appropriate because Jo-Carroll has experienced greater need for the facilities along Indian Ridge Road because of residential construction. Accordingly, extending Jo-Carroll's line along Indian Ridge Road to provide the service to the customer in question also allows Jo-Carroll to meet its long term business needs for additional facilities in that area.

6. Based on Jo-Carroll's business needs and accepted engineering practices, it is Affiant's opinion that the appropriate route for providing service to Jamie Rowe is along Indian Ridge Road and the additional cost to Jo-Carroll is \$5,881.32 ( $\$4,148.62 + \$1,732.70 = \$5,881.32$ ).

7. The facilities of Jo-Carroll will be constructed underground and along Indian Ridge Road, a public right of way upon which Jo-Carroll's facilities already exist. There will be no

